

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

JOE JOHNSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case Nos.
	)	8:22-cv-02422-TDC
THINK COMPUTER CORPORATION	)	8:22-cv-02573-TDC
d/b/a PLAINSITE,	)	
	)	
Defendant.	)	

**MOTION TO SET DEADLINE FOR FILING THE JOINT RECORD**

Defendant Think Computer Corporation (“Think”) moves the Court to specify the deadline for filing the Joint Record for the pending motion to remand and strike. This motion is needed because, under the Case Management Order, the record is to be submitted seven days after the last brief. If no further briefs were filed in Case No. TDC-22-2422, that deadline would be today. Although counsel anticipate that plaintiff Johnson will likely file a reply brief, the plaintiff has responded neither to an inquiry about whether he intends to file a reply, nor to a request to cooperate in producing the Joint Record. (Because Think’s counsel have the production facilities, Think is ready to assemble and print the final digital and hard copies for submission.)

Johnson has not responded to a request for consent to a proposed motion to set that deadline.

Respectfully submitted,

/s/ Paul Alan Levy  
Paul Alan Levy (DC Bar 946400)  
Public Citizen Litigation Group  
1600 20th Street, NW  
Washington, D.C. 20009  
(202) 588-7725  
plevy@citizen.org

/s/ Oliver L. Edwards

OLIVER L. EDWARDS (#17006)  
Law Office of Oliver Edwards LLC  
9919 Rogart Road  
Silver Spring, Maryland 20901  
Voice: 301-841-8050  
Fax: 301-273-1020

November 9, 2022

Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I certify that on this date I am causing this motion and proposed order to be served on the plaintiff Joe Johnson by filing it by ECF, which will in turn effect service on Johnson.

/s/ Paul Alan Levy

November 9, 2022